

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION CO.
AND SEAFARERS INTERNATIONAL UNION

Defendants

CIVIL NO. 98-1548 (CCC)
Consolidated with
CIVIL NO. 97-2437 (CCC)

MOTION

TO THE HONORABLE COURT:

NOW COMES co-defendant Crowley Towing and Transportation Co. (hereinafter “Crowley”), through the undersigned attorneys, and very respectfully states and prays as follows:

1. On March 14, 2005 J.H. Zidell, Counsel for Co-plaintiffs Luis Alvarez and Miguel Vazquez, sent the undersigned an e-mail asking that on his behalf a Motion for Extension of Time be presented requesting fifteen (15) additional days to file the Stipulation for Dismissal. Mr. Zidell needs this extension to obtain the signatures of his two (2) clients in the Confidential and General Release Agreement Without Admission of Liability. This extension of time would move the period within which to file the Stipulation for Dismissal to April 1, 2005.

2. The Defendants have no objection that the extension be granted.

WHEREFORE, it is respectfully requested from this Honorable Court that it grant the parties until April 1, 2005 to file the Stipulation for Dismissal of the case of the two (2) remaining Plaintiffs, Luis Alvarez and Miguel Vazquez.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of March, 2005.

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CERTIFICATE OF SERVICE: We hereby certify that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Ana R. Biascoechea, Esq., biascoechea@microjuris.com, and Ellen Silver, Esq., esilver@seafarers.org. We also certify that we have mailed by United States Postal Service the document to the following non CM/EDF participants: J. H. Zidell, Esq., City National Bank Building, 300 71st St., Suite 605, Miami Beach, FL 33141 and Luis A. Suárez, Esq., 2108 Ave. Borinquen, San Juan, P.R. 00915.

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s/**RAQUEL M. DULZAIDES**
USDC-PR No. 201406